



SEALED

Office of the United States Attorney  
District of Nevada  
501 Las Vegas Boulevard, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336

JASON M. FRIERSON  
United States Attorney  
Nevada Bar Number 7709  
RICHARD ANTHONY LOPEZ  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: 702.388.6336 / Fax: 702.388.6418  
tony.lopez@usdoj.gov

GLENN S. LEON  
Chief, Fraud Section  
SARA HALLMARK  
Trial Attorney  
U.S. Department of Justice  
Fraud Section  
PO Box 386  
Washington, DC 20044  
(202) 514-2696  
Sara.Hallmark2@usdoj.gov  
*Attorney for the United States*

**FILED**  
JUN 25 2024  
U.S. MAGISTRATE JUDGE  
BY \_\_\_\_\_

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GARY GERARD TOPOLEWSKI,

Defendant.

Case No 2:24-MJ- 558 -MDC

**GOVERNMENT'S MOTION TO  
SEAL COMPLAINT**

**(Filed Under Seal)**

The government respectfully moves this Honorable Court for an Order sealing the Complaint, this motion, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the disclosure of the Complaint may alert the defendant of a pending arrest. Although the

1 defendant may be aware of the FBI investigation into his conduct, he is unlikely unaware of  
2 the extent of the investigation or of his imminent arrest. Accordingly, there is reason to  
3 believe that the disclosure of the information contained within the Complaint will give the  
4 defendant an opportunity to flee or continue flight from prosecution, or destroy or tamper  
5 with evidence.

6 Accordingly, there is reason to believe that notification of the existence of the  
7 complaint will seriously jeopardize the investigation and would likely place law  
8 enforcement at higher risk of confrontation when securing the arrest of the defendant.

9 DATED this 25th day of June, 2024.

10 Respectfully submitted,  
11 JASON M. FRIERSON  
United States Attorney

12 

13  
14 RICHARD ANTHONY LOPEZ  
15 Assistant United States Attorney

16 SARA HALLMARK  
17 Trial Attorney  
U.S. Department of Justice  
18 Fraud Section  
19  
20  
21  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

**FILED**  
JUN 25 2024  
U.S. MAGISTRATE JUDGE  
BY \_\_\_\_\_

UNITED STATES OF AMERICA,

Plaintiff,

v.

GARY GERARD TOPOLEWSKI,

Defendant.

Case No 2:24-MJ- 558 -MDC

**ORDER ON GOVERNMENT'S  
MOTION TO SEAL COMPLAINT**

**(Filed Under Seal)**

Based on the pending motion of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's motion, and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 25<sup>th</sup> day of June, 2024.

  
\_\_\_\_\_  
HON. MAXIMILIANO D. COUVILLIER, III  
UNITED STATES MAGISTRATE JUDGE